

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE CITIGROUP, INC. SECURITIES  
LITIGATION

**STIPULATION AND ~~PROPOSED~~  
REVISED SCHEDULING ORDER**

File No. 07 Civ. 9901 (SHS)

By order dated December 23, 2010, the Court entered a pre-trial schedule in this Action (the "Scheduling Order"). The Scheduling Order directed the parties to "make all reasonable efforts to coordinate discovery in this action with discovery in the *In re Citigroup Inc. Bond Litig.*, 08 Civ. 9522 (SHS)." Pursuant to the Scheduling Order, the parties to this Action and the Bond Action have been actively coordinating discovery between the Actions. Pursuant to the Scheduling Order, fact discovery in the Securities Action and the Bond Action is currently scheduled to close on March 30, 2012. On November 23, 2011, the Court entered an order coordinating discovery between the Securities Action, the Bond Action and several individual actions consolidated under the caption *International Fund Management S.S.A., et al. v. Citigroup Inc., et al.*, No. 09 Civ. 8755 (SHS) (the "Individual Actions"). On December 2, 2011, the Court entered a pre-trial scheduling order in the Individual Actions, which sets a fact-discovery cut-off of June 15, 2012. In order to facilitate the coordination of discovery between the Securities Action, the Bond Action, and the Individual Actions, and allow adequate time to schedule remaining depositions, the parties in all of these Actions have agreed that all of these Actions should have the same fact discovery deadline, the fact discovery cut-off should be extended to July 13, 2012, and all other dates in the Scheduling Order adjusted

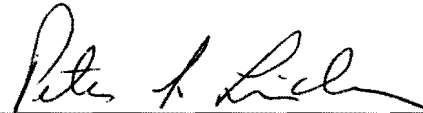
accordingly. Accordingly, all parties to this Action respectfully request that the Court enter the revised schedule set forth below:

<b><u>EVENT</u></b>	<b><u>EXISTING DEADLINE</u></b>	<b><u>NEW DEADLINE</u></b>
Close of Fact Discovery	March 30, 2012	July 13, 2012
Last Day to Amend Pleadings	April 13, 2012	August 3, 2012
Exchange of Initial Expert Reports by Parties Who Bear the Burden of Proof on Any Issue	May 18, 2012	August 17, 2012
Exchange of Rebuttal Expert Reports	June 15, 2012	September 21, 2012
Exchange of Expert Reply Reports	July 10, 2012	October 19, 2012
Expert Depositions Complete	August 28, 2012	November 16, 2012
Last Day to File Dispositive Motions	September 28, 2012	December 14, 2012
Opposition to Dispositive Motions	October 26, 2012	January 25, 2013
Replies in Support of Dispositive Motions	November 9, 2012	February 8, 2013
Filing of Proposed Pretrial Order	December 2012	March 2013

The parties anticipate that other pre-trial scheduling matters, such as the specific date for filing the pre-trial order, the scheduling of a pre-trial conference and the submission of proposed jury instructions, voir dire questionnaires, and evidentiary motions, will be resolved by mutual agreement at a later date.

Dated: January 24, 2012  
New York, New York

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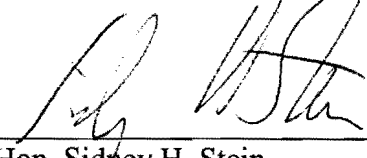
Dated: January 24, 2012  
New York, New York

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**SO ORDERED** this 2 day of February, 2012:

  
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Hon. Sidney H. Stein  
United States District Judge